DOCUMENT RESUME

ED 178 633 UD 019 856

AUTHOR Kimbrough, Jackie; Crocker, Stephen
TITLE An Evaluation of the Emergency School Aid Act Nonprofit Organization Program: Vol. IV, Conclusions and Policy Recommendations.
INSTITUTION Rand Corp., Santa Monica, Calif.
SPONS AGENCY Office of Education (DHEW), Washington, D.C.
REPORT NO R-2312-4-HEW
PUB DATE Dec 78
CONTRACT 300-76-0311
NOTE 43p.; For related documents, see ED 161 998 and UD 019 854-855

EDRS PRICE MF01/PC02 Plus Postage.
DESCRIPTORS Community Attitudes; *Community Organizations; Elementary Secondary Education; *Federal Aid; Minority Group Children; *Program Effectiveness; Program Evaluation; *School Integration
IDENTIFIERS *Emergency School Aid Act 1972

ABSTRACT

This report presents the results of an evaluation of the Nonprofit Organization Program (NPO) of the Emergency School Aid Act of 1972. The program provides financial assistance to nonprofit community organizations to support the development or implementation of public school desegregation or otherwise reduce or eliminate minority group isolation. This volume reviews the history of the NPO program and describes the methodology of the evaluation study. In addition, it discusses major findings on both the local and Federal levels, analyzes the criteria by which organizations are funded, and presents policy recommendations with regard to funding and promotion of NPO impact and autonomy. (GC)

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AN EVALUATION OF THE EMERGENCY SCHOOL AID ACT NONPROFIT ORGANIZATION PROGRAM: VOL. IV, CONCLUSIONS AND POLICY RECOMMENDATIONS

PREPARED FOR THE U.S. OFFICE OF EDUCATION
DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

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R-2312/4-HEW
DECEMBER 1978

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The work upon which this publication is based was performed pursuant to Contract No. 300-76-0311 with the U.S. Office of Education, Department of Health, Education, and Welfare. Views or conclusions contained in this study should not be interpreted as representing the official opinion or policy of the Department of Health, Education, and Welfare.

LC Card No. 78-16701

Published by The Rand Corporation

PREFACE

The Emergency School Aid Act (ESAA) of 1972 authorizes grants or contracts to nonprofit organizations (NPOs) and local education agencies (LEAs) to support the LEAs' efforts to desegregate or to reduce minority group isolation or its effects. The NPO program is a small component of ESAA which provides financial assistance to community organizations to support the LEAs' efforts. NPOs are funded on the assumption that certain activities related to school desegregation can be effectively performed by organizations outside the regular school district structure.

The Rand Corporation conducted an evaluation of the NPO program for the Office of Planning, Budgeting, and Evaluation (OPBE) of the U.S. Office of Education under Contract No. 300-76-0311, with Stephen Crocker as Principal Investigator and Study Director from July 1976 through August 1978, and Jackie Kimbrough as Principal Investigator through December 1978. The research results are reported in four volumes, which have the common title, *An Evaluation of the Emergency School Aid Act Nonprofit Organization Program.*

Volume I, *An Analysis of Federal Program Implementation and Funding Procedures* (J. Kimbrough and J. Hyman, R-2312/1-HEW), examines the legislative and programmatic history of the ESAA-NPO program and analyzes the grant awards process for NPOs.

Volume II, *A Description of Local Program Operations* (S. Crocker and P. W. Sperlich, R-2312/2-HEW), describes NPO operations at the local school district level.

Volume III, *The Role of Community Organizations in Facilitating School Desegregation* (L. McDonnell and G. Zellman, R-2312/3-HEW), compares the effectiveness of ESAA-NPOs and non-ESAA community organizations.

Volume IV, *Conclusions and Policy Recommendations* (J. Kimbrough and S. Crocker, R-2312/4-HEW), summarizes study findings and presents specific policy recommendations.

This volume is addressed to NPO personnel, to federal agency and school district personnel associated with the NPO program, and to education professionals interested in the role of community organizations in facilitating school desegregation.

ACKNOWLEDGMENTS

We are grateful to the many people who made valuable contributions to this report. As a summary volume, the report was based on our own research as well as that of our colleagues, James Hyman, Lorraine McDonnell, and Gail Zellman. An initial draft of this report was the responsibility of Stephen Crocker, Principal Investigator and Study Director. The study team reviewed the report and their comments helped considerably in clarifying and integrating study findings. We were also fortunate in being able to rely on the desegregation and community organization expertise of Advisory Committee members, Jess Pat Elliot, Joanne Fountain, Winifred Green, Ruby Martin, Muriel Snowden, and Newman Walker; and of Rand consultant, J. Alfred Cannon. The report has been strengthened considerably by the thoughtful comments of Rand technical reviewers, Paul Hill and Anthony Pascal, and of Rand Education Program Manager, John Pincus. We also appreciate the supportive role throughout the research of Robert York of the U.S. Office of Education, the technical monitor of this study. Finally, we are deeply indebted to the many respondents who gave generously of their time, and candidly of their insights.

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I. INTRODUCTION

This report presents the results of The Rand Corporation's evaluation of the Nonprofit Organization Program (NPO) of the Emergency School Aid Act (ESAA) of 1972.[1] The evaluation was designed to identify factors related to NPO effectiveness and to make recommendations for increasing the effectiveness of the ESAA-NPO program.

The Emergency School Aid Act provides financial assistance to local education agencies (LEAs) and NPOs to (a) meet the special needs incident to the elimination of segregation and discrimination; (b) encourage the voluntary elimination, reduction, or prevention of minority group isolation;[2] and (c) aid school children in overcoming the educational disadvantages of minority group isolation.[3] Congress appropriated approximately $1.2 billion for ESAA in fiscal years 1973 through 1977, with an average yearly appropriation of some $230 million. Eight percent of the annual ESAA appropriation is reserved for the NPO program, which funds nonprofit community organizations to support the development or implementation of the LEA desegregation plan or the LEA plan to prevent, reduce, or eliminate minority group isolation. In FY 1976, the initial year of the evaluation, $17.2 million of the year's $245 million appropriation went to the NPO program. These funds were awarded to 215 NPO projects in 44 states.[4] The NPO projects were sponsored by a rather broad range of groups, including both local organizations and local chapters of national organizations. NPO funds were

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[1] Public Law 92-318, Section 702(b).

[2] The term minority group isolation, as defined in the statute, means that "... minority group children constitute more than 50 percentum of the enrollment of a school", Sec. 720(11). Minority group isolation may be de jure or de facto. Segregation, as interpreted in the ESAA regulations, refers to the illegal separation of minority-group children or faculty from their nonminority counterparts.

[3] The third objective was eliminated in the Education Amendments of 1978.

[4] States not receiving NPO funds included Maine, Vermont, New Hampshire, West Virginia, Wisconsin, and Rhode Island.

awarded to civic groups, human relations groups, educational services groups, fraternal organizations, and recreational groups. Grants awarded ranged from $2,200 to $356,000 with an average grant size of $80,000.

Case studies[1] of desegregation efforts in communities across the nation provide considerable empirical support for the notion that community organizations[2] can promote school desegregation. For example, prior to the development of a desegregation plan, community groups have served as litigants for desegregation lawsuits, or provided litigants with information regarding the lawsuits; built public support for desegregated education; and increased public awareness regarding the level of segregation in district schools. During the development of the plan, and during preparation for implementation, community groups have promoted desegregation by providing information relevant to litigation, building support for desegregation and the plan, providing input into the plan and desegregation-related district policies, and serving as a communications link between the public and the LEA. After a plan has been implemented, community organizations have furthered desegregation efforts by maintaining public support for desegregation and the plan, encouraging parent participation in the schools, monitoring implementation of the plan, promoting student and parent interracial understanding, addressing second generation problems, assisting in crisis resolution, and monitoring the employment status of minority personnel. Thus, the literature supports the policy notion that community organizations are capable of promoting school desegregation.

HISTORY OF THE NPO PROGRAM

The ESAA-NPO program evolved from the Community Groups (CG) program

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[1]Case studies referred to were reported by the U.S. Commission on Civil Rights, 1970-1977; Mercer, 1973, Crain, 1968; Epps, 1971; Smith, 1973.

[2]Community organizations, as the term is used here, does not only refer to ESAA-funded groups, but to the broader range of community organizations working to promote school desegregation.

of ESAA's predecessor, the Emergency School Assistance Program (ESAP). During the late summer and early fall of 1970, a large number of school districts in the southern and southeastern states were hastily attempting to implement court-ordered and voluntary desegregation plans. Acknowledging the school district's need for financial assistance during this transition period, President Nixon called on Congress to provide the necessary legislation and funding. In August 1970, Congress responded by appropriating $75 million to the Emergency School Assistance Program (ESAP). Ninety percent of the funds were appropriate to LEAs and 10 percent to Community Groups. ESAP was not a law, but rather, an emergency provision created under the statutory authority of six existing acts.[1] The purpose of ESAP was:

> ... to meet special needs incident to the elimination of racial segregation and discrimination among students and faculty in elementary and secondary schools by contributing to the costs of new or expanded activities to be carried out by the local educational agencies or other agencies, organizations or institutions ...[2]

Intent of Desegregation Assistance Funds

ESAP was implemented as an interim measure while Congress debated the Emergency School Aid legislation. The legislative debate was characterized by limited executive branch support for desegregation and considerable Congressional conflict over the program's goals. The major issues were whether ESAA should be a national program or a program for court-ordered southern districts; whether it should provide categorical aid or general aid; and whether it should focus on compensatory

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[1]The Educational Professions Development Act, Part D (20 U.S.D. 1119-1119a); the Cooperative Research Act (20 U.S.C. 331-332b); the Civil Rights Act of 1964; Title IV (42 U.S.D. 200c-200c9); the Elementary and Secondary Education Amendments of 1965, Section 807 (20 U.S.C. 887); the Elementary and Secondary Education Amendments of 1978, Section 402 (20 U.S.C. 1222); the Economic Opportunity Act of 1964, Title II (42 U.S.C. 2781-2837) (under authority delegated to the the Secretary of Health, Education, and Welfare).

[2]Code of Federal Regulations, Title 45, Section 181.2, 1970.

education activities or activities to promote integrated education. The Administration bill (HR 17846), which was passed by the House of Representatives in 1970, provided for compensatory education and general aid to southern court-ordered districts. The Senate, which felt that eligibility guidelines for school districts were too loose, failed to pass the Administration bill. In January 1971, Senators Mondale, Brooke, Kennedy, and others[1] sponsored competing legislation, the Quality Integrated Education Act (S 682) which provided for categorical aid to promote integrated education on a nationwide basis. Thus, ESAP was implemented in the context of mixed signals from Congress and the Nixon Administration regarding the extent to which desegregation goals were to be vigorously pursued.

ESAP's Community Groups provision was initiated by the Civil Rights coalition, an alliance of activist organizations[2] involved in promoting southern school desegregation in the late 1960s and early 1970s. The coalition lobbied at the Department of Health, Education, and Welfare (HEW) for the inclusion of the community groups provision, arguing that in an era when southern LEAs resisted desegregation, community organizations demonstrated in favor of desegregation, helped draw desegregation plans, provided moral support for students attending desegregated schools, and monitored the local school boards' plan implementation.[3] HEW officials acknowledged that the southern community groups in the late 1960s had performed a critical desegregation advocacy function that the schools, the state departments of education,

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[1]Other Senate sponsors of the Quality Integrated Education Act of 1971 included Senators Bagli, Case, Cranston, Gravel, Harris, Hatfield, Hughes, Humphrey, Inouye, McGovern, Montoya, Muskie, Randolf, Ribicoff, and Tunney.

[2]The group referred to as the Civil Rights coalition consisted of several local, regional, and national organizations with a history of advocacy for civil rights. The coalition typically included, but was not limited to, the American Friends Service Committee; Delta Ministry of the National Council of Churches; Lawyers Committee for Civil Rights Under Law; Lawyers Constitutional Defense Committee; NAACP Legal Defense and Educational Fund, Inc.; and the Washington Research Project.

[3]B. McPhee, *ESAP Community Grants*, Southern Education Foundation, Atlanta, 1971; W. Green, American Friends Service Committee, Interview, 1978; H. Mizell, Delta Ministry, Interview, 1978.

and the courts were either unwilling or unable to do.[1] Thus, the Community Groups program was based on the dual premises that a catalyst was needed to induce school districts to desegregate and that certain desegregation-related activities could be most effectively performed by organizations external to the school district.

ESAP Implementation

Initial community group operations were influenced by both HEW's limited attention to the small Community Groups provision, and by LEA concerns that "... these unqualified individuals and groups ..." would infringe on the domain of the school boards.[2] For example, the Community Groups program was initially administered separately from the LEA program, in part because the Office of Education (OE) wanted to maintain credibility among its southern school superintendent constituency, and in part because many regional and federal OE officials were unsympathetic to the Community Groups provision.[3] Furthermore, the Community Groups Office was understaffed, and frequently unable to provide organizations with requested technical assistance.

OE responded to the desegregation emergency by disbursing virtually all LEA funds by early fall 1970. However, Community Groups funds were not disbursed until February 1971. The delay in disbursing Community Groups funds reflected administrative problems in the understaffed Community Groups Office and conflict regarding whether State Education Agencies (SEAs) and LEAs should be allowed to review community group proposals. There was no provision for such review in the regulations. However, a statutory authority of the Community Groups program (Office of Economic Opportunity legislation) required gubernatorial approval, which served as a proxy for LEA approval in some southern states. In Mississippi and Alabama, the governors

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[1] J. Brader, Director, Division of Equal Educational Opportunity, 1970, Interview, 1978.

[2] Kirschner Associates, Inc., *National Evaluation of Emergency School Assistance Program Community Groups*, prepared for DHEW, OPBE, 1972.

[3] McPhee, op. cit., pp. 2-4.

vetoed virtually all community group applications, arguing that the projects did not "... have the approval of the local boards of education ...,"[1] that "... the proposed activities of these groups would be detrimental ...,"[2] and that "... the money would be more effective ... if given to local school authorities ...."[3] The Secretary of HEW overrode many of these gubernatorial vetoes, resulting in the funding of considerably more community groups than would otherwise have been possible.

ESAP initially funded some 150 community organizations in 14 southern and southeastern states. A small, predominantly black staff, who reportedly lacked experience in federal program administration, operated the Community Groups program in Washington. Since the staff supported the notion of an autonomous Community Groups program, and since the regulations did not restrict community group activities or require cooperation with LEAs, the Community Groups program became primarily a desegregation advocacy effort. Specifically, community groups helped draw desegregation plans, publicized desegregation-related activities of the LEAs, monitored LEA implementation of the plans, provided support to affected students and parents (e.g., educational assistance, moral support), monitored the hiring, promotion, and firing of minority personnel, and encouraged parent participation in the schools. In many southern communities where LEAs continued to resist school desegregation,[4] the desegregation advocacy activities of community groups generated conflict with the LEAs. This conflict

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[1] Correspondence from George C. Wallace, Governor of Alabama, to the Department of Health, Education, and Welfare, 1971.

[2] Correspondence from John B. Williams, Governor of Mississippi, to the Department of Health, Education, and Welfare, Atlanta, Georgia, 1971.

[3] Ibid.

[4] An evaluation of 295 ESAP LEAs by the American Friends Service Committee et al. (1970) found that 179 were engaged in practices which rendered them ineligible for funding. According to the evaluation, some districts received funds without submitting plans; others used funds to resegregate classrooms and perpetuate racial stereotypes; still others used the funds as general aid, to purchase non-desegregation related equipment and supplies.

resulted in complaints to Congress about the independent and frequently adversarial activities of the federally funded community groups. Changes were subsequently made in the regulations and operations which limited the community group role in desegregation assistance.

The initial change occurred in the summer of 1971, when the Community Groups and LEA programs were consolidated and placed in the newly created Bureau of Equal Educational Opportunity (BEEO). At the same time, there was an effort to make the overall desegregation assistance program more responsive to LEA concerns and priorities, which curtailed the role of community groups as relatively independent advocates of desegregation.

In regard to the issue of community group autonomy, a 1971 OE review concluded that most community group activities could be conducted independently of LEA activities.[1] However, the issue of NPO autonomy remained salient, and HEW officials urged the Secretary to immediately

> ... give school districts the right to comment on (community group) proposals ... to avoid the expectation that HEW will give LEAs the right of veto over community group's applications ...[2]

Subsequent regulations required that community group applications be accompanied by comments from the LEA.[3] Furthermore, BEEO guidelines (contained in the "Information Handbook for Public and Private Nonprofit Organizations") described the preferred relationship between LEAs and community groups, noting that community groups should seek the cooperation of LEAs.

The new regulations placed no restrictions on community group activities. However, the Handbook specifically prohibited community

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[1]Office of Education Memorandum, *The ESAP Community Group Program*, 1971.

[2]Office of Education Memorandum to the Secretary of HEW, 1971.

[3]Code of Federal Regulations, Title 45, Section 181-6(b)5, 1971.

group monitoring of LEA plan implementation, and regional program officers, in pre-grant technical assistance meetings, began to encourage community groups to conduct educational service activities. Civil rights groups and community organizations protested that these changes coopted community efforts to promote desegregation, but the changes remained in effect. Thus, by the time the ESAA legislation was passed, changes in community group activities and autonomy had been incorporated into regular BEEO program operations.

ESAA Implementation

In June 1972, the basic provisions of ESAP were enacted into law as the Emergency School Aid Act.[1] The statute represents a compromise between the Administration bill's initial focus on compensatory education and general aid to southern court-ordered districts, and the Quality Integrated Education Act's focus on categorical aid to support integrated education on a national basis. The statute provides ESAA funds nationwide. Furthermore, the statute lists remedial services as the initial authorized activity for LEAs, although NPO activities are not specified. Nor does the statute prescribe NPO-LEA relations, other than to note that the NPO program should "... complement any programs or projects carried out by the local education agency under section 706."[2]

The issue of overall program intent has remained salient since the inception of ESAP. Operationally, a major focus of the program has been to provide compensatory and remedial educational services.[3] However, several Congressional and GAO reports have noted that this narrow focus was not the intent of the statute. During the 1971 ESAA hearings, for instance, the House Committee on Education and Labor deleted from the Administration bill a separate category of eligibility

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[1]ESAA was enacted as Title VII of the Education Amendments of 1972 to the Elementary and Secondary Education Act of 1967.

[2]Public Law 92-318, Sec. 708(3).

[3]U.S. House of Representatives, *Hearings Before the Subcommittee on Elementary, Secondary, and Vocational Education of the Committee on Education and Labor*, 1975.

for LEAs involved only in compensatory education, noting that "...the focus of this bill is on desegregation and integration, and not on compensatory education."[1] Furthermore, during hearings on the Educational Amendments of 1974, the House Committee expressed concern that HEW, on its own initiative, was turning ESAA into simply another compensatory education program.[2] The Senate hearings raised similar concerns, noting that human relations programs tended to be more effective than compensatory education programs when dealing with desegregation or reduction of minority group isolation.[3] Nevertheless, despite several governmental reports noting that ESAA was not intended to be a compensatory education program, a major focus of both the LEA and NPO programs has been to provide compensatory and remedial services.

Summary

The history of the NPO program fails to yield a clear programmatic intent. During legislative debate, there was considerable conflict regarding whether ESAA should provide compensatory education or promote integrated education. In the early stages of ESAP, community groups tended to be autonomous organizations working to promote integrated education. By the time ESAA was enacted, the community organizations had lost some of their autonomy, and were involved primarily in compensatory and remedial education efforts. This compensatory/remedial focus has continued to dominate the NPO and LEA programs, despite repeated evidence that such a program focus was not the intent of the legislation. The effect of conflicting programmatic intent on the effectiveness evaluation is discussed below.

STUDY OBJECTIVES

The evaluation was designed to identify factors related to NPO effectiveness and to make recommendations for improving the NPO program.

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[1] U.S. House of Representatives, *Hearings Before the Committee on Education and Labor*, 1971, p. 15.

[2] U.S. House of Representatives, *Hearings on the Education Amendments of 1974*.

[3] U.S. Senate, *Hearings on the Education Amendments of 1974*.

The program's history reveals a fundamental conflict regarding intent which posed difficulties for the evaluation. Because of the tension between declared ESAA purposes and actual NPO operations, it was necessary to establish an effectiveness criterion based on our best judgments about overall legislative goals. The history of the program might well lead other researchers to choose a different standard for establishing effectiveness criteria. However, the statute describes the purpose of ESAA as providing funds for meeting special needs in eliminating segregation, and for eliminating, reducing, or preventing minority group isolation and its effects. Thus, our effectiveness criterion was the extent to which NPOs were able to eliminate/reduce segregation; or conversely, the extent to which they were able to further desegregation. This effectiveness criterion was the basis of the following evaluation objectives:

- To describe the organizations involved in facilitating desegregation.
- To compare the structure and operations of NPOs and non-ESAA community organizations working to facilitate desegregation.
- To examine the relationship between community organization activities and LEA desegregation stages.
- To examine the effect of LEA and community involvement in NPO activities.
- To identify factors that predict effectiveness in facilitating desegregation.
- To compare the effectiveness of NPOs and non-ESAA community organizations.
- To examine changes in regulations and implementation from the ESAP-CG to the ESAA-NPO program.
- To examine the relationship between federal program implementation and local NPO operations.
- To determine whether the awards criteria operate equitably and are related to effectiveness.

RESEARCH DESIGN AND MEASUREMENT

We addressed these objectives through research at both the local school district level and at the federal program implementation level. This dual research approach was chosen since attempts to determine effectiveness on the local level would be incomplete without attention to the federal policy/procedural context the program operates in.

The research involved four interrelated data collection efforts (two at the local implementation level; two at the federal implementation level) which are described in detail in Volumes I, II, and III of this report series. The research design and measurement approaches of those efforts are described briefly below.

The Effectiveness Comparison Between ESAA-NPOs and Non-ESAA Community Organizations[1]

This aspect of the research examined structural and operational differences between NPOs and non-ESAA community groups, compared their effectiveness, and identified factors that predict effectiveness.

The research was based on LEA record data and case survey data obtained through interviews with some 1000 respondents in 40 school districts across the nation. The sample included all currently desegregating districts with NPOs. The remaining districts with NPOs were stratified by size and region, and then randomly selected for inclusion in the sample. The sample of organizations, which included 59 NPOs and 71 other community organizations, was selected randomly from district-wide lists of all community groups working to promote school desegregation or to reduce minority group isolation.

The Measurement of Impact. As noted earlier, our effectiveness criterion was the extent to which community groups were able to further, or promote, desegregation in their communities. Specifically, we were interested in:

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[1]Volume III, *The Role of Community Organizations in Facilitating School Desegregation*, R-2312/3-HEW, L. McDonnell and G. Zellman, 1978.

- The extent to which the community group affected the desegregation process (e.g., whether the substance or timing of the desegregation plan was affected).
- The extent to which the community group affected school district policies, programs, or procedures (e.g., whether district suspension policies were changed).

On the basis of the effectiveness criterion, we constructed an impact measure to assess desegregation-related change achieved by the community groups. For each community group, we measured three kinds of change. First, we measured the *type and scope* of change produced, which referred to the number of kinds of people, policies, and/or institutions affected by the community group. High impact scores were given to groups that affected large numbers of people, to groups that affected decisionmakers, and to groups that changed the substance of the plan or district policies.

We also assessed the *implementation stage of the change*. The concern here was the extent to which community groups had progressed from "intent" to actual "implementation." We assigned high scores for changes in process, and low scores for increasing awareness, or consciousness of desegregation-related issues.

Finally, we assessed the *relationship of the change to the desegregation process*. This measurement component evaluated the extent to which the community group facilitated desegregation or reduced the effects of minority group isolation,[1] with a higher score being given for facilitating desegregation.

Scores on each of these dimensions, which were based on evidence from a wide range of respondents, were summed to produce a single impact score. Evidence of impact was based on readily observable outcomes, including the establishment of district desegregation policies, increases in parent participation, and improvement in student achievement. We checked the validity of the data by interviewing respondents

[1]The effects of minority isolation are generally interpreted to include low academic achievement and limited exposure to various aspects of American culture.

with various relationships to the community groups. We gathered evidence of group activity and change from the organizations themselves, as well as from the targets of their activities. For example, if a group tutored students, the Rand site visit team interviewed parents, teachers, and principals to find out if the program was affecting student achievement. If a group lobbied for changes in school district policies, involved residents, as well as LEA administrators and school board members, were asked about the group and the extent to which its activities influenced district decisionmaking. Thus, conclusions about a group's impact were corroborated by a variety of sources before they were used as the basis of an impact score.

The Description of NPO Operations at the Local Level[1]

This aspect of the research examined the types of organizations and activities receiving NPO funds; the demographic characteristics of the organizations and their staff; and the relationship between NPO activities, community involvement with NPOs, and desegregation status of LEAs. The information was provided by data from mail questionnaires sent to the project directors of 215 NPOs funded in fiscal year 1976, 81 percent of whom returned completed questionnaires.

The Development and Implementation of the NPO Program[2]

This aspect of the research focused on federal level implementation, and explored the political context of NPO program development, the policy rationale for the community group provision of the legislation, and the relationship between aspects of federal program implementation and local NPO operations. The research was based on interviews with approximately 50 respondents associated with the development and/or implementation of ESAP and ESAA. Respondents were randomly selected within strata based on major issue areas, and were interviewed during three week-long field trips to Washington, D.C.

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[1]Volume II, *A Description of Local Program Operations*, R-2312/2-HEW, S. Crocker and P. W. Sperlich, 1978.

[2]Volume I, *An Analysis of Federal Program Implementation and Funding Procedures*, R-2312/1-HEW, J. Kimbrough and J. Hyman, 1978.

The Analysis of the NPO Grants Award Criteria[1]

This research described the NPO funding process at the federal level, and analyzed the awards criteria and the relationship between proposal scores and impact as measured by this evaluation. The research was based primarily on record data of actual scores awarded to all fiscal year 1976 applicants. Data were obtained through the 10 HEW Regional Offices responsible for program administration.

ORGANIZATION OF THE REPORT

The remainder of the report is organized as follows: Findings from research on local level community group operations are discussed in Sec. II. Findings from research on federal implementation procedures are discussed in Sec. III, and policy recommendations based on local and federal level findings in Sec. IV.

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[1] Ibid.

II. MAJOR FINDINGS: LOCAL LEVEL

Data collection efforts at the local level were designed to

- Describe the organizations involved in facilitating desegregation.
- Compare the structure and operations of NPOs and non-ESAA community organizations working to facilitate desegregation.
- Examine the relationship between community organization activities and LEA desegregation stages.
- Examine the effect of LEA and community involvement in NPO activities.
- Identify factors that predict impact in facilitating desegregation.
- Compare the impact of NPOs and non-ESAA community organizations.

As noted in Sec. I, NPO descriptive information was provided by mail questionnaire data from directors of 175 NPO projects funded in FY 1976. Impact data and comparisons of NPOs and non-ESAA community organizations were based on case survey data collected from 131 community groups (45 percent of which received NPO funds) in 40 school districts across the nation. Major findings of the analyses are presented below.

DESCRIPTION OF COMMUNITY GROUPS

The community organizations involved in the study represented a broad spectrum of both NPOs and non-ESAA groups, ranging from civic, business, and civil rights groups to neighborhood-based service organizations. Forty-two percent of the groups were membership organizations, and the remainder were service delivery organizations with clientele, rather than members. Almost one-third of the groups had operated in their communities for more than 20 years, while only 16 percent had been in existence for two years or less.

The community organizations represented a broad variety of financial arrangements with 10 groups having no funds, and 5 groups having

financial resources of more than $1 million. Most groups had budgets between $10,000 and $100,000, and 38 percent of the organizations received most of their money from private sources (e.g., membership dues, fund-raising activities, donations). The remaining 62 percent of the sample received funds from local, state, and federal governmental sources (including, but not limited to, the ESAA-NPO program). Thirty percent of all groups had no paid staff, and most organizations with paid staff employed 15 or fewer people.

Although there are no comparable data for the non-ESAA sample, 60 percent of the project directors in the NPO sample were minority. NPO directors and their staff tended to be long-term residents of their communities: some 53 percent of the directors, and 49 percent of the staff had lived in the area for 10 or more years.

COMPARISON OF NPOs AND NON-ESAA GROUPS

NPOs and non-ESAA community groups working to facilitate desegregation differed from one another along a variety of dimensions. In terms of organizational characteristics, NPOs were more recently established in the community than other groups, with 75 percent of NPOs in operation 16 years or less, and 44 percent of the non-ESAA community groups in operation 16 years or more. Furthermore, while 75 percent of the non-ESAA groups were membership groups, only 30 percent of the NPOs had members. Rather, NPOs were typically service organizations, with minimal client participation and few volunteers. NPOs generally had greater resources than the non-ESAA groups, since 14 percent of the non-ESAA groups had no outside sources of funding and 55 percent had no paid staff members. By definition, all NPOs had financial resources, and 63 percent of the NPOs had seven or more full-time paid staff members. Though not as well off materially as the NPOs, the non-ESAA groups had a number of organizational resources that the NPOs did not have. For example, non-ESAA groups were more likely than NPOs to have active volunteers, to have influence in the community apart from the group leader's influence, and to receive media coverage. Despite their lack of material resources, non-ESAA groups were less likely than NPOs to ask for and receive resources from the LEA in their community.

NPOs and non-ESAA community organizations also typically engaged in different types of activities. For instance, 86 percent of the NPOs provided educational services, while only 25 percent of the non-ESAA groups were involved in such activities. Typical of these educational service activities were

- Remedial services, including tutoring and language labs.
- Cultural enrichment or recreation, including field trips, bazaars, and plays.
- Career guidance, planning, or counseling.
- Counseling on student expulsions and suspensions.
- Curriculum development.

Conversely, 68 percent of the non-ESAA groups and 31 percent of the NPOs engaged in advocacy activities, including

- Efforts to increase community influence on school decision-making.
- Efforts to influence site selection or school closings.
- Efforts to influence the development and distribution of district budgets.
- Efforts to monitor the hiring/firing of minority personnel.
- Information dissemination.

Finally, 45 percent of non-ESAA groups and 3 percent of NPOs were involved in desegregation-specific activities--such as

- Efforts to influence the content of the desegregation plan.
- Efforts to influence the timing of the desegregation plan.
- Participation in the desegregation lawsuit.
- Efforts to reduce white flight.

Another major difference between NPOs and non-ESAA groups was their choice of strategies. NPOs were less likely than other groups in the sample to engage in organized citizen action to achieve group

goals. That is, NPOs were less likely than the non-ESAA groups to protest district policies with which they disagreed, or to form coalitions with other groups to achieve common goals. Many NPOs attributed their lack of active citizen participation to their dependence for funding on continued LEA goodwill. Finally, NPOs were less likely than other groups to have members who held elective or appointive office, or who were personally active in local politics.

COMMUNITY GROUP RELATIONSHIP TO DESEGREGATION STAGE

NPO funds were not targeted to currently desegregating districts. Instead, nearly 70 percent of the districts in which NPOs operated had either completed implementation of their desegregation plan five or more years ago, or had only a plan to reduce minority group isolation and no desegregation plan. Furthermore, NPO activities were not related to the district's stage of school desegregation. NPOs tended to deliver education service activities regardless of the desegregation stage of the school district. While it is frequently argued that remedial programs are useful after a plan has been implemented, NPOs were as likely to conduct such programs in districts currently implementing a plan as in districts that completed implementation of their plans 10 years ago. In a number of districts in preimplementation or early implementation stages of desegregation, the NPO conducted a tutorial program while non-ESAA groups assisted in plan implementation or attempted to influence the content or timing of the plan.

Non-ESAA groups were more likely to respond to the local desegregation context in choosing group activities; they were significantly more likely than NPOs to select educational service activities in districts with older plans and to engage in advocacy or desegregation-related activities in more recently desegregated districts.

LEA/COMMUNITY PARTICIPATION IN NPOs

ESAA Advisory Committees, which are required by the regulations, provide a mechanism for community involvement in the NPO and LEA programs. An analysis of Advisory Committee participation indicated that if there was active Advisory Committee participation, NPOs tended to

provide educational service activities. Similarly, if there was active LEA involvement with the NPO, the NPO tended to provide educational service activities. However, if there was active participation in the NPO by the community at large, NPOs tended to engage in desegregation advocacy activities.

PREDICTORS OF IMPACT

Our impact measure rated as most effective those organizations that promoted desegregation through institutional change. It was not surprising, then, that the best predictor of high impact for both NPOs and non-ESAA groups was involvement in advocacy activities. Groups most likely to be successful chose activities like information dissemination, attempting to increase community influence on LEA decision-making, and monitoring the hiring, promotion, and firing of minority personnel.

The second best predictor of a community group's impact was the group's choice of strategies to further desegregation-related organizational goals. Organizations with the greatest impact in promoting desegregation were those that chose citizen action strategies. Specifically, groups that formed coalitions in pursuit of common goals and groups that publicly disagreed with, or presented petitions to the schoolboard were more likely to bring about change than groups that did not use these strategies.

Community group impact was not predicted by organizational resources, such as budget, size of staff, and visibility. Furthermore, district characteristics such as enrollment, student racial composition, responsiveness to community input, and recency of plan implementation also failed to predict group impact.

COMPARISON OF IMPACT OF NPOs AND NON-ESAA GROUPS

More non-ESAA groups than NPOs had a significant impact on desegregation. High impact scores were obtained by 38 percent of the non-ESAA groups, and by 7 percent of the NPOs. Most NPOs (78 percent) obtained moderate impact scores.

A major source of the moderate NPO outcomes was their choice of

activities. As we noted above, NPOs performed educational service activities more often than non-ESAA community organizations. These activities had minimal impact in promoting desegregation. In contrast, the non-ESAA groups were more likely to engage in advocacy activities, which had a higher impact in promoting desegregation. Interestingly, the overwhelming majority of NPOs were perceived by respondents as engaged in lower risk, lower payoff activities than were the non-ESAA community organizations in the same school districts.

A related source of differences in impact between NPOs and non-ESAA groups was in the groups' choice of strategies for promoting desegregation. Non-ESAA groups more often than NPOs chose citizen action strategies in addressing problems related to desegregation. These strategies, which involved addressing LEA policies, publicizing desegregation issues, and forming coalitions, had more impact on the process of desegregation than did the NPOs' strategies, which largely ignored participation in citizen action.

CONCLUSION

Fewer NPOs than non-ESAA groups had a high impact on the process of desegregation. This finding does not suggest that NPOs were ineffective; rather, it suggests that NPOs were not involved in activities or strategies with the most potential for effectiveness in promoting desegregation. Some reasons for this limited involvement in potentially effective activities and strategies are explored in Sec. III.

III. MAJOR FINDINGS: FEDERAL LEVEL

The analysis of the federal role in implementation of the NPO program was based on an examination of federal policies and procedures, including an analysis of the program's grant award criteria. Major findings are presented below.

NPO PROGRAM IMPLEMENTATION

A major focus of the effectiveness evaluation was NPO operations on the local level. Recent research on program implementation, however, suggests that it is unrealistic to attempt an effectiveness evaluation on the local level without attention to the implementation processes at the federal level.[1] This aspect of the evaluation, then, examined the relationship between federal implementation policies and procedures and local NPO operations.[2] Policies and procedures that limit organizational involvement in potentially effective activities and strategies have been identified and are discussed below.

EEOP[3] POLICY ORIENTATION

In an examination of the implementation of ESEA Title I, Murphy (1971) notes that Office of Education (OE) program administrators, like political figures, are "subject to the demands of their constituencies and the constraints of their bureaucracies ...." In OE this constituency is the local school districts, rather than community activists or desegregation advocates. Crocker et al. (1976) note that

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[1] E. Bardach, *The Implementation Game: What Happens After a Bill Becomes a Law*, MIT Press, Cambridge, 1977.

[2] This research also examined the NPO legislative history and changes in NPO program implementation. These topics are summarized in Sec. I.

[3] Formerly known as the Bureau of Equal Educational Opportunity (BEEO), the Equal Educational Opportunities Program (EEOP) of the U.S. Office of Education is responsible for administering ESAA.

OE programs are typically staffed by former school administrators, many of whom share the perspective of, and have allegiance to, the LEAs. This staffing pattern is evident in EEOP, where the majority of federal program administrators have prior experience as educators. The concern for LEA priorities is reinforced by the fact that the vast majority of ESAA funds are appropriated by law to LEAs, a sizeable and effectively organized external constituency. Thus, the NPO program, with neither strong internal support nor an effective external constituency, is implemented by program administrators whose primary allegiance is to LEAs.

Perhaps the most critical aspect of EEOP's policy orientation is the lack of a desegregation advocacy focus in the program responsible for desegregation assistance. EEOP officials generally acknowledge that the function of the program is not to advocate desegregation, but rather, to make grant awards consistent with the statute. Thus, the single federal office responsible for desegregation assistance functions as merely an administrative and procedural entity.

The effects of this policy orientation on other aspects of program implementation are described below.

LEA-NPO RELATIONS

The issue of LEA-NPO relations has been salient throughout the history of the NPO program. While the ESAA statute requires only that the NPO program complement and support the LEA plan, subsequent regulations and EEOP guidelines go considerably further in promoting LEA dominance over NPOs. For example, the regulations require the applicant NPO to provide the LEA with 15 days to review the NPO proposal, offer recommendations, and submit comments to the Assistant Secretary. The NPO is also required to describe provisions for effective liaison with the LEA. Moreover, program officers, in pre-grant technical assistance meetings with prospective NPO applicants, stress the significance of NPOs developing and maintaining cooperative relations with the LEAs. At these pre-grant technical assistance meetings, program officers encourage NPOs to submit, with their applications, letters of comment from the LEAs. OE argues that such letters simply provide evidence that the LEA is aware of the NPO's proposed activities. However, a review of the

1976-77 letters revealed that the vast majority did not merely acknowledge awareness of the NPO's activities. Rather, they evaluated the need for the proposed activities, as well as the NPO's plan for implementing the activities. In effect, then, the NPO's proposal to facilitate school desegregation is evaluated by the LEA as well as by the federal review panel.

Furthermore, the proposal review process weights equally NPO cooperation with the LEA in needs assessment and the magnitude of need which the NPO addresses. Thus, an NPO proposal without a strong letter of LEA support, or without documentation to indicate collaboration with the LEA in needs assessment, may lose points in the review process. Finally, the four-member review panels are weighted in favor of LEAs, with three panelists representing the educational system and only one panelist a community representative.

The powerful position of LEAs supported by the cumulative impact of the regulations, guidelines, and EEOP operations apparently limits NPO autonomy in addressing desegregation-related problems. For instance, case studies indicated that NPOs were less likely than non-ESAA groups to protest LEA policies they disagreed with. Most NPOs attributed their public silence toward LEAs to their perception that NPO funding depended on continued LEA goodwill and approval. Thus, the current OE policies result in the funding of NPOs that are less likely than other community groups in the same school district to be involved in citizen participation and desegregation advocacy. Case studies also indicated that the weak position of the NPO serves as a deterrent to many *bona fide* desegregation advocacy groups who would otherwise apply for NPO funding. In numerous districts, community organizations which used citizen action strategies to further desegregation goals chose not to apply for ESAA funding, contending that their legitimacy would be compromised by implicit requirements for LEA approval.

AUTHORIZED NPO ACTIVITIES

While the law does not specify or disallow any particular NPO activities, the first three activities listed in the regulations provide for educational services. Case studies indicated that educational service activities are also encouraged by both EEOP staff in

pre-grant technical assistance meetings, and by local school officials in the joint needs assessment meetings. And while desegregation advocacy and monitoring activities are not prohibited by law, these activities are not encouraged by either the EEOP staff or by the LEAs during needs assessment sessions, nor are they listed as authorized activities in the regulations or on the application forms.

To the extent that EEOP and school district administrators promote educational services and fail to promote advocacy and desegregation-specific activities, the potential effectiveness of community organizations in promoting desegregation is limited. First, case studies indicated that educational services have less impact on the process of desegregation than advocacy, community relations, and other desegregation-specific activities. Furthermore, there is little reason to expect community organizations to be skilled or experienced in providing educational services, and the continued emphasis on such activities is an inherent restriction on NPO effectiveness. Finally, since educational services are the domain of the LEA, such a program orientation serves to increase NPO dependence on school districts.

CONCLUSION

The statute neither restricts specific NPO activities nor prescribes NPO/LEA relations other than to note that the NPO program should "... complement ... projects carried out by the local education agency ...."[1] Thus, procedures limiting NPO autonomy and restricting NPO activities apparently reflect specific OE and EEOP policy concerns, rather than the general strictures of the legislation.

NPO GRANT AWARD CRITERIA

The impact of federal programs depends, in part, on whether funds are targeted to areas of greatest need, and to grantees most likely to effectively address these needs. As part of the NPO effectiveness

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[1]Public Law 92-318, Sec. 708b.

evaluation, we analyzed the criteria used in the funding of NPO proposals in order to

- Determine whether selection criteria are biased in favor of certain types of districts.
- Determine the relationship between level of impact at the NPOs we visited, and proposal rating scores for the same projects.

Funding criteria for the NPO program and results of the funding criteria analysis are described briefly below.

DESCRIPTION OF FUNDING CRITERIA

Proposals for ESAA-NPO funding are rated according to two criteria, the Statistical Criteria and the Quality Criteria. The sum of points awarded for both becomes the final score for a proposal. These scores are ranked in descending order within each state, and individual applications are funded until the state apportionment of funds for the NPO program is exhausted.

The Statistical Criteria are designed to determine a school district's need for desegregation assistance funds, and consist of four rating scales. Two of the scales award points for the absolute number and percentage of minority student enrollment in the district, with higher points going to districts with more minority students. The use of both absolute and relative measures of minority enrollment was designed to insure that small districts with relatively large minority enrollments were not excluded.

The other two rating scales award points for the absolute amount and percentage of "reduction of minority group isolation." This term refers to the decrease in minority enrollment in district schools expected to result from desegregation. The measurement of net reduction of minority group isolation is complex, and is computed as the difference between two counts of minority students over the period of time between the applicant district's base year and the project year. The base year is defined as the school year immediately preceding the

institution of the district's current plan. The project year is defined as the year in which ESAA-NPO funds are requested.

In contrast to the Statistical Criteria, the Quality Criteria, which consist of five components, evaluate the merits of the NPO proposals. The Needs Assessment Component evaluates the seriousness and immediacy of desegregation-related needs, as well as the extent to which the NPO applicant has cooperated with the LEA in defining those needs. The Objectives Component assesses the probability of success of the NPO goals and program design in relationship to the statement of needs. The Activities Component measures the feasibility of the proposed activities, staffing, service delivery, and community involvement in meeting desegregation-related needs. The Resource Management Component evaluates the relationship between the proposed project and the anticipated expenditures. Finally, the Evaluation Component assesses the applicant's plan to evaluate objectively whether project goals have been achieved. The maximum score for each component is 6 points, with the exception of the Activities Component, which can receive 21 points. Thus, the Quality Criteria explicitly make proposed activities a major determinant of funding.

ANALYSIS OF STATISTICAL AND QUALITY CRITERIA

The two absolute statistical measures were found to dominate the two relative statistical measures in determining the rank order of total statistical scores. Thus, the Statistical Criteria operate to the funding advantage of districts with large absolute numbers of minority students.

These results confirmed two observations from the fieldwork: Community organizations in small districts frequently did not apply for NPO funding, feeling they had no chance of competing against organizations applying from large districts. Further, NPOs often felt their future funding was dependent on whether organizations from the largest districts in the state applied.

The measure of "effective net reduction of minority group isolation" was found to operate to the disadvantage of actively desegregating districts with phase-in desegregation plans. Since base year

figures are static, the process for calculating "net reduction" tends to favor NPO applicants from districts that desegregated earlier rather than from currently desegregating districts, or from districts that phase in aspects of the plan over time. Moreover, the criteria allow districts that desegregated many years ago to show desegregation need, and there is no mechanism in the criteria to disqualify, or phase out, such districts.

RELATIONSHIP OF CRITERIA AND IMPACT

Statistical scores were found to be unrelated to NPO impact, as measured by data generated during our site visits to NPO projects. One of the four statistical scales--Percentage of Minority Students Enrolled--had a small though significant negative correlation with impact. This means that lower impact NPOs were found in districts with high enrollments of minority students. This finding was not surprising, since the districts' racial characteristics limited the potential for desegregation; hence NPOs were typically involved in more educational services and in fewer desegregation advocacy activities.

Quality scores yielded a small, though significant positive correlation with observed impact. Two components of the Quality Criteria--Resource Management and Evaluation--were uncorrelated with observed NPO impact.

The total score for an NPO proposal (Statistical Criteria score plus Quality Criteria score) was uncorrelated with observed NPO effectiveness. Overall, the funding criteria neither impeded nor facilitated the funding of effective NPOs. Rather, effectiveness was randomly associated with total proposal scores.

CONCLUSION

In general, the federal level implementation procedures examined in this research did not promote NPO effectiveness. Federal implementation procedures tended to limit NPO autonomy in selecting organizational strategies and to restrict NPO choice of activities. Further, the grant awards analysis indicated that NPO proposals scores were

unrelated to impact. Finally, funding criteria worked to the advantage of large school districts, and to the disadvantage of currently desegregating districts with phase-in plans.

IV. POLICY RECOMMENDATIONS

The policy recommendations described below represent an integration of findings from research on the local and federal levels. Three broad areas of suggested policy change have been identified and are discussed in terms of specific policy recommendations.

REVISE FUNDING CRITERIA

1. *Discontinue all Statistical Criteria except the "Effective Net Reduction of Minority Group Isolation--Percent Children" scale, but revise the base year to one or two years prior to the project year.*

Statistical scores were unrelated to impact, as measured by the evaluation. Moreover, statistical scores worked to the advantage of districts with large minority enrollments, and to the disadvantage of currently desegregating districts with phase-in plans. An obvious recommendation, then, is to discontinue use of all Statistical Criteria. However, this approach would result in virtual abdication of control in dispensing NPO funds to areas of greatest need.

Thus, we recommend that the percent net reduction scale be retained. However, the scale should not be used as a component of a statistical score, but rather, as a prescreening eligibility criterion with a specified minimum number of points to determine district need for NPO funds.

To eliminate the funding advantage to districts which desegregated long ago, the method for calculating the percent net reduction would have to be revised. The revision involves defining the base year as occurring one or two years prior to the project year, so that competition would be based on the districts' current efforts to desegregate, rather than on their cumulative desegregation progress.

This scale would also eliminate the bias toward funding districts with large minority enrollments, since NPOs would qualify for assistance

only on the basis of relative desegregation effort. That is, regardless of minority enrollment, districts that reduce minority group isolation by the same percentage would be ranked equally in the awards process.

2. *Target NPO funds to districts actively involved in the desegregation process.*

We found that 69 percent of NPOs were funded in districts not actively involved in desegregation and that NPOs in those districts typically engaged in low impact educational service activities. Since a major aim of the ESAA legislation was to provide assistance to desegregating districts, such targeting seems appropriate. One way to accomplish this goal is to increase the significance of the statement of need by increasing the number of points that can be awarded for magnitude of need. A criterion of need should be established, such that NPOs are awarded the maximum number of points only when the district is actively involved in desegregation and when desegregation needs are clearly identified. Thus, NPOs in districts that desegregated many years earlier or in districts that have resegregated would be eligible for funding only after demonstrating their active involvement in desegregation and their need for NPO funds.

3. *Eliminate Resource Management and Evaluation as components of the Quality Criteria.*

We found that neither criteria, as currently measured, contributed to the identification of potentially effective NPOs. Thus, we recommend that Resource Management and Evaluation be eliminated from the Quality Criteria score. However, if policymakers feel these topics should be addressed by NPO applicants, they could be retained as part of the initial Administrative Review of applications.

PROMOTE NPO IMPACT

1. *Develop additional Quality Criteria based on factors related to impact.*

On the Quality Criteria scale, the Activities category accounts for 12 of the possible 45 points which may be awarded. While we found that Activities were the best predictors of impact, they should probably not be used as the sole major determinant of quality points. Rather, in accord with our findings that citizen action strategies were the second best predictors of high impact, variables measuring organizational strategy should be included as funding criteria. Strategy might be assessed by asking applicant NPOs to describe their relationships with other community organizations working in desegregation in the district and their responses to past LEA initiatives in desegregation.

2. *Eliminate compensatory and tutorial educational services, and encourage desegregation-related educational services.*

We found that most NPOs (85 percent) engaged in educational services, and that educational service activities had a lower impact on desegregation than advocacy activities. Further, a large proportion of educational services offered by NPOs were remedial and compensatory, despite GAO reports[1] and Congressional hearings[2] noting that ESAA was designed to facilitate desegregation, not compensatory education. Thus, it seems consistent with the intent of the legislation to eliminate compensatory and remedial educational services. By recommending this change, we are not suggesting that tutorials, career information, and

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[1]U.S. Comptroller General, *Better Criteria Needed for Awarding Grants for School Desegregation*, January 1978.

[2]U.S. House of Representatives, *Hearings Before the Committee on Education and Labor*, 1971.

extracurricular activities are unimportant. Rather, with so few dollars allocated to NPOs relative to LEAs, it is neither efficient nor cost-effective to charge NPOs with a task more suitable to LEAs.

There was no evidence to support the complete elimination of education service activities by NPOs; in fact, this approach would probably be unrealistic, since NPO applicants tend to be service organizations. Instead, we recommend that regulations and technical assistance procedures be revised to encourage desegregation-related educational services. Such desegregation-related education services, which might include activities to promote intercultural awareness and understanding, would be consistent with the overall intent of the ESAA legislation.

3. *Promote desegregation-related community relations, monitoring, and advocacy activities.*

The data indicated that community groups had the highest impact on desegregation when they engaged in activities such as information dissemination, encouraging better school-community relations, increasing community input into school desegregation policy, influencing site selection and school closings, and encouraging the hiring/promotion of minority staff. We recommend that the regulations and pre-grant technical assistance procedures be revised to encourage these types of activities. We realize that a similar activity focus during ESAP was eliminated, in part because of LEA opposition and in part because of limited support from BEEO. While LEA opposition may continue, these activities seem feasible if implemented by an administration responsive to community group concerns, and if efforts are made to increase NPO independence from LEAs.

4. *Restructure the NPO Advisory Committee.*

The data indicated that active Advisory Committee participation in NPO operations was associated with NPOs engaging in low impact educational services, while active community participation was associated

with NPOs engaging in high impact desegregation advocacy activities. To promote NPO effectiveness, we recommend that the Advisory Committee be restructured to include broader community participation. Specifically, the Advisory Committee might include several other community organizations working to promote desegregation in the same district. This approach would provide the NPO with a mechanism for consistent contact with organizations addressing similar issues, and might help the NPOs form coalitions, a strategy associated with effectiveness.

PROMOTE NPO AUTONOMY

1. *Eliminate the required 15 day LEA review of NPO proposals and the LEA letters of comment.*

Both of these procedures were perceived by NPOs and by non-ESAA funded community organizations as a source of veto power over NPO applicants. Hence, these requirements effectively deterred many community groups from applying for NPO funds, especially those engaged in potentially effective advocacy activities and citizen action strategies. We thus recommend the elimination of both these requirements, and all other procedures that promote the perception of LEA control over NPOs. The need for mutual cooperation and coordination between the LEA and NPO can be met as described below.

2. *Promote mutual LEA-NPO cooperation through a joint Needs Assessment procedure.*

The need for mutual cooperation and coordination between the NPO and LEA is essential, and can perhaps be best met through the regulatory requirement of a formal Needs Assessment procedure to be followed by the NPO and the LEA. It is recommended that *prior* to developing their funding applications, the NPO and LEA meet to assess the needs of the district and their relationship to the district's phase of desegregation. Appropriate activities could be discussed at this time,

and both groups could attempt to coordinate their desegregation assistance efforts. A by-product of this process is that districts might become more aware of potential problems, and have an opportunity for solving them with the assistance of community groups outside the district structure.

The Needs Assessment criteria award points to the NPO for evidence of attempted cooperation with the LEA. This procedure was found to promote (the perception of) LEA control over NPOs and should be eliminated. Rather, we recommend that regulations, guidelines, and EEOP technical assistance communications stress among LEA and NPO applicants the need for *mutual* coordination and cooperation.

3. *Restructure proposal review panels to equalize community-LEA impact.*

We found that the ESAA-NPO review panels were weighted in favor of the education system, with three of the four panelists representing educators, and only one panelist a community representative. We recommend that the review panels be restructured to more equitably reflect community group concerns and input.

4. *Create an NPO administrative structure less vulnerable to LEA influence.*

The research indicated that EEOP's concern for LEA priorities jeopardized the potential effectiveness of the NPOs. Thus, we recommend that the NPO program be provided with an administrative structure less vulnerable to the influence of LEA concerns. There are at least two ways in which this could be accomplished. First, the program might be removed from EEOP and placed within a federal entity that has a desegregation advocacy thrust and that is not insensitive to the political needs of community organizations. Such federal entities might include the Civil Rights Division of the Department of Justice, which is relatively independent of external political pressure, or the Office for Civil Rights, which, like EEOP, is part

of HEW. While such change might enhance the advocacy thrust of the program, it would probably be detrimental to cooperative relationships with LEAs.

Another alternative would be to keep the program within EEOP, but separate it from the LEA program. It could be administered by a Deputy Associate Commissioner, and staffed by employees responsive to community group concerns. Thus, the NPO program would remain in close physical proximity to the total ESAA effort, but would maintain its own internal support.

If these recommendations were implemented, the NPO program would differ substantially from the current program. For instance, the grant award process would be more equitable; hence, an increased number of NPOs would be funded in smaller districts and in currently desegregating districts with phase-in plans. Furthermore, NPOs would be engaged in activities and strategies that promote school desegregation, rather than in those that provide compensatory education. Finally, NPOs would be less subject to LEA approval and influence. Thus, they would be able to operate as entities distinct from LEAs, and use their perspectives and skills in addressing the community's desegregation-related needs.

REFERENCES

American Friends Service Committee, Delta Ministry of the National Council of Churches, Lawyers' Committee for Civil Rights Under Law, Lawyers Constitutional Defense Committee, NAACP Legal Defense and Educational Fund, Inc., and the Washington Research Project, *The Emergency School Assistance Program: An Evaluation*, 1970.

Bardach, E., *The Implementation Game: What Happens After a Bill Becomes a Law*, MIT Press, Cambridge, 1977.

Crain, R., *The Politics of School Desegregation*, Aldine Co., Chicago, 1968.

Crocker, S., R. L. Crain, M. H. Graubard, J. M. Kimbrough, E. J. King, M. A. Thomas, and F. M. Wirt, *Title IV of the Civil Rights Act of 1964: A Review of Program Operations*, The Rand Corporation, R-1901/2-HEW, Santa Monica, 1976.

Epps, E., Untitled paper presented to the Real Estate Research Corporation, 1971.

Kirschner Associates, Inc., *National Evaluation of Emergency School Assistance Program Community Groups*, 1972.

McPhee, B., *ESAP Community Grants*, Southern Education Foundation, Atlanta, 1971.

Mercer, J., E. Wegner, and M. Coleman, *Conceptualizing and Implementing School Desegregation: A Manual for School Administrators*, University of California, Riverside, 1973.

Smith, A., A. Downs, and M. Lachman, *Achieving Effective Desegregation*, Lexington Books, Lexington, Massachusetts, 1973.